

I wish to register my opposition to this proposal.

The proposed rules would have the reverse effect of the petitioner's intentions. First, the required inventory of spare parts and/or modules, in order to insure repairability of any and all possible failures, would be cost prohibitive. A complete second spare unit would be fully redundant, and likely at less cost.

Second, the proposed rules would DECREASE the reliability of today's equipment by re-introducing historically known failure points, namely sockets, circuit card or module edge connectors, and discrete components. This would be a technological step backward.

Third, it would increase the size, manufacturing cost, and failure rate, while DECREASING the functionality and feature offering of most product lines. Functionality would likely be sacrificed in favor of size and cost considerations.

With all due respect to the petitioner, I respectfully urge the Commission to reject this proposal. Thank you.